



The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BAY STATE GAS COMPANY
D.T.E. 05-27

SECOND SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO UWUA LOCAL 273 and NANCY BROCKWAY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to UWUA Local 273 ("Local 273") the following Information Requests:

INSTRUCTIONS

The following additional instructions apply to this set of Information Requests.

1. Please file one copy of the responses with Mary Cottrell, Secretary of the Department and on all parties; also submit seven (7) copies of the responses to A. John Sullivan, Rates and Revenue Requirement Division, one (1) copy to Jeff Hall, and one (1) copy to Andreas Thanos.
8. In addition to filing, all non-proprietary responses should be submitted by e-mail to caroline.bulger@state.ma.us, dte.efiling@state.ma.us, and to the e-mail address of any party required to be served within four calendar days.

INFORMATION REQUESTS

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| DTE-UWUA 2-1 | Refer to Exhibit UWUA-Brockway, at 56, lines 15-23 and Mr. Bryant's testimony from July 12, 2005, at 1035-1037. Given this discussion regarding the Company's request for recovery of the Metscan costs and how that recovery is tied to the existence of the capital leases, are there any changes you would make to your recommendation pertaining to the Metscan costs? If not, why not? If so, please describe any changes. |
| DTE-UWUA 2-2 | Refer to Exhibit UWUA-Brockway, at 56, lines 18-20. Given the fact that Bay State Gas decided to go forward with the installation of the |

Metscan devices in 1987, how long should the Company have waited before undertaking such a decision, especially in light of the Company's claim that problems did not become evident with the Metscan devices until they had been in service for seven years?

DTE-UWUA 2-3

Refer to Exhibit UWUA-Brockway, at 63, lines 17-19. Is the witness aware that Bay State Gas was not an affiliate of NiSource when it adopted the Metscan technology in 1987?